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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ADRIAN RISKIN,  
  
Petitioner and Plaintiff,  
  
vs.  
  
CITY OF LOS ANGELES,  
  
Respondent and Defendant.

Case No.: 19STCV20076  
  
**VERIFIED PETITION FOR WRIT OF  
MANDATE AND COMPLAINT FOR  
DECLARATORY RELIEF**  
  
[California Constitution Article I § 3; Gov’t  
Code §§ 6250, *et seq.*; Civ. Proc. Code  
§§ 1060, 1085, *et seq.*]

1 **INTRODUCTION**

2 1. This is a petition to enforce the California Public Records Act (“CPRA”) against  
3 Respondent and Defendant (“Respondent”) City of Los Angeles (“the City”). Petitioner and  
4 Plaintiff (“Petitioner”) Adrian Riskin submitted five requests to the City for public records related  
5 to Los Angeles City Council District 11’s (“CD11”) suspected involvement in the displacement of  
6 homeless people and its activity on certain electronic platforms—all clearly-identifiable records  
7 subject to mandatory disclosure under the CPRA. Despite Petitioner’s repeated attempts to obtain  
8 these records, Respondent has ceased communication with Petitioner and failed to provide any  
9 records in response to Petitioner’s requests. Respondent has thereby violated the CPRA and the  
10 California Constitution.

11 2. The public’s access to information is obstructed by Respondent’s blatant disregard  
12 for transparency and manifest violation of the CPRA. By this Petition and Complaint (“Petition”)  
13 and pursuant to the Code of Civil Procedure §§ 1060 and 1085, *et seq.* and Government Code  
14 §§ 6250, *et seq.*,<sup>1</sup> Petitioner respectfully requests from this Court (1) a writ of mandate to command  
15 Respondent to disclose all non-exempt information Petitioner requested and thereby comply with  
16 the CPRA; and (2) a declaration that Respondent’s conduct denying access to public records fails to  
17 comply with the CPRA.

18 **JURISDICTION AND VENUE**

19 3. This Court has jurisdiction under §§ 6258, 6259, Code of Civ. Proc. § 1085, and  
20 Article VI, Section 10 of the California Constitution.

21 4. Venue is proper in this Court. The records in question, or some portion of them, are  
22 situated in the County of Los Angeles, § 6259; the acts or omissions complained of occurred in the  
23 County of Los Angeles, Code of Civ. Proc. § 393; and Respondent is located in the County of Los  
24 Angeles, Code of Civ. Proc. § 395.

25 **PARTIES**

26 5. Petitioner Adrian Riskin is a resident of Los Angeles, holds a PhD in mathematics,  
27 works as a mathematics professor at a local college, and is an open records activist. Riskin utilizes

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<sup>1</sup> Unless otherwise stated, all references to code sections are to the California Government Code.

1 public records requests to investigate and understand the activities of the Los Angeles City  
2 government. He publicizes his findings to the public through blogging and community events.  
3 Information Riskin has uncovered via CPRA requests has assisted the media, academic researchers,  
4 and the public at large in understanding local government in Los Angeles. For example, the Los  
5 Angeles Times recently quoted Riskin regarding the City's politicized response to homelessness;  
6 the newspaper used records that Riskin uncovered through CPRA requests to confront Mayor  
7 Garcetti's office regarding its directive to sweep a homeless encampment in order to make way for  
8 a planned political event.<sup>2</sup> Riskin's research regarding the thwarted formulation of a Skid Row  
9 Neighborhood Council, uncovered largely through public records requests, was recently featured as  
10 part of an exhibit at the Los Angeles Poverty Department Museum. Documentary filmmakers have  
11 used records Riskin uncovered to inform their ongoing production of a film on the Greater West  
12 Hollywood Food Coalition and the Hollywood Media District Business Improvement District.  
13 Additionally, Riskin has empowered the public to use the CPRA effectively for both research and  
14 civic activism by publishing a guide to the practical use of the CPRA in the City of Los Angeles.  
15 Riskin is a member of the public within the meaning of §§ 6252(b)-(c).

16 6. Respondent City of Los Angeles is a local public agency within the meaning of  
17 § 6252(a), (d).

## 18 **FACTUAL ALLEGATIONS**

### 19 **Background regarding CD11's suspected involvement in erecting planters to displace** 20 **homeless residents of Los Angeles**

21 7. CD11 encompasses the Venice neighborhood of Los Angeles. In 2018, dozens of  
22 planter boxes were constructed on public sidewalks in Venice, particularly in areas that had been  
23 popular resting places for homeless people. Many activists in the neighborhood oppose the planters,  
24 arguing that they were installed with the intention and effect of displacing Venice's homeless  
25 residents. Other similar planters have appeared in other neighborhoods throughout Los Angeles, as  
26 well.

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27 <sup>2</sup> Emily Alpert Reyes, Benjamin Oreskes, and Dough Smith, "L.A. is swamped with 311 complaints over homeless  
28 camps. But are the cleanups pointless?" Los Angeles Times (Jun. 7, 2019) *available at*  
<http://www.latimes.com/local/lanow/la-me-ln-homeless-cleanups-accelerate-20190607-htmlstory.html>.

1           8.       Notably, while the planters have been a source of much debate in the community, no  
2 one has publicly admitted to installing the planters.<sup>3</sup> Moreover, no public authority appears to have  
3 issued permits for the planters; the Los Angeles Bureau of Engineering publicly stated that the  
4 planters require permits under the Los Angeles Municipal Code, but no permits had been approved  
5 for their construction.<sup>4</sup> See LAMC § 62.118.2. A spokesperson for Councilmember Mike Bonin,  
6 who represents CD11, has stated that he was not aware of any city department’s involvement in the  
7 placing of the planter boxes.<sup>5</sup>

8           9.       Recently through a separate CPRA request, Petitioner obtained a copy of an email  
9 thread—which is also responsive to Respondent’s Request 1 at issue in this case—between Venice  
10 Field Deputy for CD11 Taylor Bazley, members of the Los Angeles Police Department (“LAPD”),  
11 and various constituents. In the email thread, Mark Ryavec of the Venice Stakeholders Association  
12 asks for “the council office’s support for the installation of a few planter boxes on the parkway, *as*  
13 *we previously have installed, with your support*, around the Post Office and along Staples. With  
14 your approval, the LAPD can certainly support the residents in asking the campers to move their  
15 belongings by 8 am Saturday morning so the installation can go forward.” (emphasis added). Bazley  
16 initially advises that LAPD can only forcibly remove homeless residents if Ryavec has a permit for  
17 the planters and suggests that LAPD could otherwise “politely ask[] but not forcibly remove[]  
18 people” in order to facilitate the installation of the planters. Ryavec confirms that his organization  
19 “did not apply for a permit” and asks that LAPD “ask[] the campers to move their stuff so the  
20 installation can proceed.” LAPD confirms its availability for such action, and Bazley coordinates a  
21 formal “clean up” of the area so that the planters can be installed. *A true and correct copy of this*  
22 *email thread is attached as Exhibit F.*

23           10.      This email thread provides strong evidence that CD11 and LAPD had direct  
24 involvement in the installation of planter boxes that have displaced homeless people in Venice.

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26 <sup>3</sup> See Brittany Martin, “How Garden Planters Became a Flashpoint in the Venice Gentrification Debate,” Los Angeles  
Magazine (Dec. 18, 2018) *available at* <https://www.lamag.com/citythinkblog/venice-planters-controversy/>.

27 <sup>4</sup> *Id.*

28 <sup>5</sup> See Andrew Mollenbeck, “Protesters Claim Beautification Project is Really to Displace Homeless,” KFI AM640  
(Nov. 19, 2018) *available at* <https://kfiam640.iheart.com/content/2018-11-19-protesters-claim-beautification-project-is-really-to-displace-homeless/>.

1 Particularly given the controversy around the planters and the secrecy regarding their origin, records  
2 from CD11 regarding to the planters and its other actions relating to homelessness in general are of  
3 particular importance to the public.

4 **Respondent violated the CPRA by failing to provide public records in response to**  
5 **Petitioner's public records requests**

6 A. Request 1

7 11. On December 26, 2018, Petitioner submitted a CPRA request to Respondent via  
8 email from his email address westsidesunshinecoalition@yahoo.com ("Request 1"). He sent the  
9 email to CD11's Councilmember Bonin, Councilmember Bonin's Chief of Staff Chad Molnar, and  
10 Councilmember Bonin's Deputy Chief of Staff Tricia Keane.<sup>6</sup> The request sought all 2018 emails  
11 between Councilmember Bonin or his staff members and a list of named individuals—including  
12 Mark Ryavec—many of whom are suspected to be involved in anti-homeless efforts or efforts to  
13 install planters to displace homeless people in Los Angeles. The request also sought all 2018 emails  
14 belonging to Councilmember Bonin or his staff members including four designated search terms—  
15 including the term "planter." *A true and correct copy of Petitioner's December 26, 2018 request to*  
16 *Respondent is attached in Exhibit A.*

17 12. On January 4, 2019, Councilmember Bonin's new Deputy Chief of Staff Krista  
18 Kline sent Petitioner an email in which she confirmed receipt of Petitioner's request. Kline stated,  
19 "Our office has records that are responsive to your request. We are currently compiling those  
20 responsive, disclosable documents and, upon completion, such documents will be made available  
21 for your review and/or copying." She asked that Petitioner "contact our office on or after February  
22 15, 2019 to arrange for a time to review the documents." She also noted that, if Petitioner wished to  
23 receive copies of the emails rather than to simply view them, her office would charge him ten cents  
24 per page for the cost of physical copies. *A true and correct copy of Respondent's January 4, 2019*  
25 *email to Petitioner is attached in Exhibit A.*

26 13. On February 15, 2019, Petitioner contacted Respondent as instructed to arrange for a  
27

28 <sup>6</sup> Although Keane was Councilmember Bonin's Deputy Chief of Staff when Petitioner's request was submitted, Krista Kline now holds the position.

1 time to review the requested documents. *A true and correct copy of Petitioner's February 15, 2019*  
2 *email to Respondent is attached in Exhibit A.*

3 14. Having received no reply from Respondent, Petitioner sent Respondent another  
4 email on February 27, 2019 inquiring as to the status of his request and noting that two weeks had  
5 passed since Respondent's estimated date of production. *A true and correct copy of Petitioner's*  
6 *February 27, 2019 email to Respondent is attached in Exhibit A.*

7 15. On February 28, 2019, Kline replied stating that she would "need another week in  
8 order to get your request in order." Kline asked that Petitioner "reach out to David early next week  
9 to schedule time to review the documents." Kline did not identify who "David" was or provide his  
10 email address. Petitioner replied that same day inquiring as to who "David" was, and Kline wrote  
11 back clarifying that "David" was "David Duran Flores." This is the last communication Petitioner  
12 ever received from Respondent regarding Request 1. *A true and correct copy of these February 28,*  
13 *2019 emails are attached in Exhibit A.*

14 16. Having received no further communication from Respondent, Petitioner again  
15 emailed Kline on March 8, 2019 to inquire as to the status of his request. He asked that Kline  
16 forward his message to Duran Flores, as Petitioner could not locate his email address. *A true and*  
17 *correct copy of Petitioner's March 8, 2019 email to Respondent is attached in Exhibit A.*

18 17. Again, Respondent did not reply to Petitioner's inquiry. Petitioner sent another email  
19 to Kline on March 14, 2019 again inquiring as to the status of his request. *A true and correct copy*  
20 *of Petitioner's March 14, 2019 email to Respondent is attached in Exhibit A.*

21 18. Still having received no further communication from Respondent, Petitioner sent yet  
22 another email to Kline—this time also cc'ing Councilmember Bonin, Molnar, and Keane—on  
23 March 18, 2019, again inquiring as to the status of his request. Petitioner again requested that the  
24 message be forwarded to Duran Flores because he could not locate his email address. *A true and*  
25 *correct copy of Petitioner's March 18, 2019 email to Respondent is attached in Exhibit A.*

26 19. Yet again, Respondent did not reply to Petitioner's email. Rather than proceeding  
27 directly to litigation, Petitioner again emailed Respondent on March 25, 2019—this time to Kline,  
28 Councilmember Bonin, Molnar, Keane, and Duran Flores, whose email address Petitioner located

1 on his own—inquiring as to the status of his request. *A true and correct copy of Petitioner’s March*  
2 *25, 2019 email to Respondent is attached in Exhibit A.*

3 20. Again, Respondent ignored Petitioner’s communication. Rather than proceeding  
4 directly to litigation, Petitioner sent yet another email to Kline, Councilmember Bonin, Molnar,  
5 Keane, and Duran Flores on April 11, 2019 inquiring as to the status of his request. He noted that he  
6 submitted his request four months previously with no production of records by Respondent.  
7 Respondent has not replied to Petitioner. *A true and correct copy of Petitioner’s April 11, 2019*  
8 *email to Respondent is attached in Exhibit A.*

9 21. Despite Petitioner’s seven follow-up communications, Respondent has ceased all  
10 contact with Petitioner. In the over five months that have passed since Petitioner submitted his  
11 request, Respondent has not produced even one of the records it promised or provided Petitioner  
12 with an accurate update as to the status of his request. Respondent has thereby violated the CPRA.

13 B. Request 2

14 22. On December 27, 2018, Petitioner submitted a CPRA request to Respondent via  
15 email from his email address westsidesunshinecoalition@yahoo.com (“Request 2”). He sent the  
16 email to Councilmember Bonin, Molnar, and Keane. The request sought all 2018 emails between  
17 Councilmember Bonin or his staff members and Saul Janson, a Los Angeles business owner who  
18 advocates for landscaping that displaces homeless people. *A true and correct copy of Petitioner’s*  
19 *December 27, 2018 request to Respondent is attached in Exhibit B.*

20 23. Respondent provided no reply to Petitioner’s Request 2. On March 8, 2019,  
21 Petitioner sent an email to Councilmember Bonin, Molnar, Keane, and Kline inquiring as to the  
22 status of Request 2 and asking whether Respondent perhaps intended to respond to Request 2 along  
23 with Request 1. *A true and correct copy of Petitioner’s March 8, 2019 email to Respondent is*  
24 *attached in Exhibit B.*

25 24. Respondent again failed to reply to Petitioner’s follow-up communication. On March  
26 14, 2019, Petitioner sent another email to the same four members of the CD11 office inquiring as to  
27 the status of Request 2. *A true and correct copy of Petitioner’s March 14, 2019 email to Respondent*  
28 *is attached in Exhibit B.*

1           25.     Respondent yet again failed to reply to Petitioner's follow-up communication.  
2     Petitioner sent another email to Respondent on March 18, 2019 again inquiring as to the status of  
3     his request. Petitioner noted in his email that Respondent had not provided any response to Request  
4     2. *A true and correct copy of Petitioner's March 18, 2019 email to Respondent is attached in*  
5     *Exhibit B.*

6           26.     Again, Respondent failed to reply to Petitioner's follow-up communication. Rather  
7     than proceeding directly to litigation, Petitioner sent yet another email to Respondent on March 25,  
8     2019 inquiring as to the status of his request. *A true and correct copy of Petitioner's March 25,*  
9     *2019 email to Respondent is attached in Exhibit B.*

10          27.     True to form, Respondent again failed to reply to Petitioner's request. Rather than  
11     proceeding directly to litigation, Petitioner on April 11, 2019 sent a final email to Respondent—to  
12     Molnar, Keane, Kline, and Duran Flores—inquiring as to the status of his request. He noted that it  
13     had been nearly four months since he submitted his request without any reply from Respondent.  
14     Again, Respondent did not reply. *A true and correct copy of Petitioner's April 11, 2019 email to*  
15     *Respondent is attached in Exhibit B.*

16          28.     Despite Petitioner's five follow-up communications to various members of the CD11  
17     office, Respondent has failed to reply to Petitioner or to engage with his request in any way  
18     whatsoever. In the over five months that have passed since Petitioner submitted Request 2,  
19     Respondent has ignored Petitioner entirely and has not produced even one of the records Petitioner  
20     requested. Respondent has thereby violated the CPRA.

21     C.     Request 3

22          29.     On February 19, 2019, Petitioner submitted a CPRA request to Respondent via email  
23     from his email address westsidesunshinecoalition@yahoo.com ("Request 3"). He sent the email to  
24     Kline. The request sought all emails from 2016 through 2019 between elected officials and staff  
25     members at CD11 and George Francisco—a Venice Neighborhood Councilmember who Petitioner  
26     discovered, through a separate CPRA request, had recently attempted in concert with the CD11  
27     office to evict an unsheltered person from the outdoor area where a holiday sign lighting was  
28     planned. *A true and correct copy of Petitioner's February 19, 2019 request to Respondent is*



1 *attached in Exhibit C.*

2 30. On February 28, 2019, Kline sent an email to Petitioner noting that her office had  
3 received his request. She stated, “Our office has records that are responsive to your request. We are  
4 currently compiling those responsive, disclosable documents and, upon completion, such documents  
5 will be made available for your review and/or copying.” She “ask[ed] that you contact our office on  
6 or after March 29, 2019 to arrange for a time to review the documents.” She also noted that, if  
7 Petitioner wished to receive copies of the emails rather than to simply view them, her office would  
8 charge him ten cents per page for the cost of physical copies. *A true and correct copy of*  
9 *Respondent’s February 28, 2019 email to Petitioner is attached in Exhibit C.*

10 31. That same day, Petitioner sent an email to Respondent asking that, because the  
11 records were electronic, CD11 send him the records electronically rather than requiring him to make  
12 an appointment to review them in person or pay for physical copies. Petitioner also stated that he  
13 believed a six-week time-frame for production constituted an unnecessary delay. *A true and correct*  
14 *copy of Petitioner’s February 28, 2019 email to Respondent is attached in Exhibit C.*

15 32. Again that same day, Kline sent another email to Petitioner. She erroneously<sup>7</sup> stated  
16 that “the law does not require that the documents be sent electronically.” She again stated that, if  
17 Respondent desired copies of emails rather than to merely view them, her office would require him  
18 to obtain hard copies produced at 10 cents per page. She again asserted that the records would not  
19 be available until March 29, 2019. *A true and correct copy of Respondent’s second February 28,*  
20 *2019 email to Petitioner is attached in Exhibit C.*

21 33. Again that same day, Petitioner sent another email to Respondent clarifying that  
22 § 6253.9(a) did, in fact, require that Respondent provide electronic records in their native electronic  
23 format. He also informed Respondent that the CPRA only allows agencies to charge for “the direct  
24 costs of duplication” and that there is no cost for duplicating electronic records in an electronic  
25 format—making CD11’s insistence on charging for physical copies an unnecessary barrier to

26 \_\_\_\_\_  
27 <sup>7</sup> See § 6253.9(a) (“Unless otherwise prohibited by law, any agency that has information that constitutes an identifiable  
28 public record not exempt from disclosure pursuant to this chapter that is in an electronic format shall make that  
information available in an electronic format when requested by any person . . .”).

1 access. *See* § 6253(b). Respondent did not reply to Petitioner’s email. *A true and correct copy of*  
2 *Petitioner’s second February 28, 2019 email to Respondent is attached in Exhibit C.*

3 34. On April 11, 2019—approximately two weeks after Respondent said the requested  
4 records would be made available—Petitioner emailed Kline and Duran Flores to inquire as to the  
5 status of his request. Respondent never again communicated with Petitioner regarding Request 3. *A*  
6 *true and correct copy of Petitioner’s April 11, 2019 email to Respondent is attached in Exhibit C.*

7 35. Respondent has, again, ceased all communication with Petitioner regarding his  
8 request. In the nearly four months that have passed since Petitioner submitted Request 3,  
9 Respondent has failed to produce even one of Petitioner’s requested records as promised.  
10 Respondent has thereby violated the CPRA.

11 D. Request 4

12 36. On February 18, 2019, Petitioner submitted a CPRA request to Respondent via email  
13 from his email address westlakeinvestigations@hotmail.com (“Request 4”). He sent the email to  
14 Councilmember Bonin. The request sought 1) a list of all official Twitter accounts used by the  
15 council office, and 2) a list of all accounts blocked or muted by those official Twitter accounts.  
16 Respondent never provided any response to Request 4. *A true and correct copy of Petitioner’s*  
17 *February 18, 2019 request to Respondent is attached in Exhibit D.*

18 37. After receiving no answer from Respondent for nearly two months, Petitioner on  
19 April 14, 2019 sent another email to Respondent—this time to Kline and Keane—inquiring as to the  
20 status of his request. *A true and correct copy of Petitioner’s April 14, 2019 email to Respondent is*  
21 *attached in Exhibit D.*

22 38. Again, Respondent did not reply to Petitioner. Rather than proceeding directly to  
23 litigation, Petitioner sent another email to Respondent on April 30, 2019. This time, Petitioner  
24 emailed Hannah Levien, a Field Deputy working in Councilmember Bonin’s office. Yet again,  
25 Respondent did not reply to Petitioner. *A true and correct copy of Petitioner’s April 30, 2019 email*  
26 *to Respondent is attached in Exhibit D.*

27 39. Despite Petitioner’s multiple follow-up communications to various members of the  
28 CD11 office, Respondent has ignored Petitioner entirely and failed to engage with Request 4 in any

1 way whatsoever. In the nearly four months that have passed since Petitioner submitted his request,  
2 Respondent has not provided even one of the easily-producible records Petitioner requested.  
3 Respondent has thereby violated the CPRA.

4 E. Request 5

5 40. On March 1, 2019, Petitioner submitted a CPRA request to Respondent via email  
6 from his email address westlakeinvestigations@hotmail.com (“Request 5”). He sent the email to  
7 Kline. The request sought electronic copies of all Romulus logs and reports from January 1, 2018  
8 through the date of the request. Romulus is a computer program used by government agencies to  
9 compile constituent communications from various electronic platforms, as well as other data. *A true*  
10 *and correct copy of Petitioner’s March 1, 2019 request to Respondent is attached in Exhibit E.*

11 41. On March 11, 2019, Respondent sent Petitioner an email in response to his request.  
12 Respondent stated that, for Romulus logs and reports for constituent communications, the request  
13 was “overly voluminous, per Section 6255(a).” Regarding all other forms of Romulus logs and  
14 reports, Respondent stated that “our office does not possess any disclosable, responsive records.”<sup>8</sup> *A*  
15 *true and correct copy of Respondent’s March 11, 2019 email to Petitioner is attached in Exhibit E.*

16 42. That same day, Petitioner sent Respondent an email questioning Respondent’s  
17 invocation of the § 6255 exemption and noting that the exemption requires Respondent to establish  
18 that the public interest served by withholding the records “clearly outweighs” the public interest  
19 served by disclosure. § 6255(a). Petitioner also asked that Respondent assist him as required under  
20 § 6253.1(a)(3)<sup>9</sup> to articulate an effective request to which Respondent would produce some portion  
21 of the requested records. Petitioner asked how much information existed in response to his total  
22 request, whether the requested records were burdensome to produce due to required redactions or  
23 other complications, and what portion of the requested information Respondent would not consider  
24

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25 <sup>8</sup> It is unclear from this response whether Respondent intended to communicate that it possessed no records at all that  
26 would be responsive to this portion of Petitioner’s request, or whether it believed that any responsive records it  
27 possessed were not disclosable under some unnamed exemption to the CPRA.

28 <sup>9</sup> Section 6253.1(a)(3) states, “When a member of the public requests to inspect a public record or obtain a copy of a  
public record, the public agency, in order to assist the member of the public make a focused and effective request that  
reasonably describes an identifiable record or records, shall do all of the following, to the extent reasonable under the  
circumstances: . . . (3) Provide suggestions for overcoming any practical basis for denying access to the records or  
information sought.”

1 to be overly voluminous. *A true and correct copy of Petitioner's March 11, 2019 email to*  
2 *Respondent is attached in Exhibit E.*

3 43. Respondent did not provide a response to Petitioner's request for assistance as  
4 required under § 6253.1(a)(3). As such, Petitioner sent Respondent another email on March 26,  
5 2019, again asking for Respondent's assistance in overcoming the obstacles that Respondent  
6 asserted existed to his request. He again noted that Respondent was required under the CPRA to  
7 provide him with such assistance. *A true and correct copy of Petitioner's March 26, 2019 email to*  
8 *Respondent is attached in Exhibit E.*

9 44. Again, Respondent did not reply to Petitioner's follow-up communication. Rather  
10 than proceeding directly to litigation, Petitioner sent another email to Respondent on April 3, 2019  
11 asking Respondent to assist him in creating a request that would result in some produced records. *A*  
12 *true and correct copy of Petitioner's April 3, 2019 email to Respondent is attached in Exhibit E.*

13 45. Respondent yet again provided no response to Petitioner. Rather than proceeding  
14 directly to litigation, Petitioner sent another email to Respondent on April 30, 2019, this time to  
15 Levien, again asking for assistance in crafting an effective request. *A true and correct copy of*  
16 *Petitioner's April 30, 2019 email to Respondent is attached in Exhibit E.*

17 46. Finally, on May 15, 2019, Respondent sent Petitioner an email simply stating, "Our  
18 office has responded to that request." Respondent failed to provide Petitioner with any additional  
19 information about his requested records or to provide him with recommendations as to how to  
20 overcome any practical basis to the production of those records. *A true and correct copy of*  
21 *Respondent's May 15, 2019 email to Petitioner is attached in Exhibit E.*

22 47. Despite Petitioner's four attempts to induce Respondent to comply with the law,  
23 Respondent refused to meaningfully engage with Petitioner's request or to provide him with  
24 suggestions as to how to overcome its concern that his request is "overly voluminous." Moreover,  
25 Respondent erroneously invoked the § 6255 exemption to the CPRA where it cannot establish that  
26 the public interest in withholding Petitioner's requested records "clearly outweighs" the public  
27 interest served by disclosure. § 6255(a). As such, Respondent improperly withheld all records in  
28 response to Request 5.

1 **Factual Summary**

2 48. By failing to adequately respond to Petitioner's repeated requests for clearly-  
3 identifiable public records subject to disclosure, Respondent has completely disregarded the need  
4 for government transparency and continues to prevent the public from accessing information of  
5 great public concern. Respondent impermissibly delayed and obstructed Petitioner's access to  
6 records and ultimately failed to provide Petitioner with even one single record in response to his  
7 five requests, let alone to do so "promptly" as required by law. *See* § 6253(b). Although it has now  
8 been nearly six months since Petitioner submitted his first request for public records subject to  
9 mandatory disclosure, Respondent continues to unlawfully withhold all records Petitioner  
10 requested.

11 49. Respondent's failure to produce public records in response to requests effectively  
12 makes secret the operations of CD11 and shields Respondent from public accountability.  
13 Particularly given recent public concern over the unlawful construction of planters in CD11's  
14 boundaries and CD11's suspected involvement in this displacement of its homeless residents  
15 without public oversight, the public interest in the requested public records is great. Judicial action  
16 is therefore necessary to enforce the requirements of the CPRA against Respondent.

17 **FIRST CAUSE OF ACTION:**  
18 **VIOLATION OF THE CALIFORNIA CONSTITUTION ARTICLE 1, § 3(b)**

19 50. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 49  
20 above, as if set forth in full.

21 51. The California Constitution provides an independent right of access to government  
22 records: "The people have the right of access to information concerning the conduct of the people's  
23 business, and, therefore, the meetings of public bodies and the writings of public officials and  
24 agencies shall be open to public scrutiny." Cal. Constitution, Art. 1 § 3(b)(1). This provision was  
25 adopted by the voters in 2004 because, as the ballot argument supporting the measure states, when  
26 Californians asked questions of their government, they increasingly found "that answers are hard to  
27 get." The constitutional provision is intended to reverse that trend.  
28

52. Respondent's failure to provide records in response to Petitioner's public records requests violates Article 1, Section 3(b) of the California Constitution.

**SECOND CAUSE OF ACTION:**  
**PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR DECLARATORY**  
**RELIEF PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT, GOV'T CODE**  
**§§ 6250, et seq.**

53. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 52 above, as if set forth in full.

## General principles of the California Public Records Act

54. Under the California Public Records Act, §§ 6250 *et seq.*, all records that are prepared, owned, used, or retained by any public agency and that are not subject to the CPRA's statutory exemptions to disclosure must be made publicly available for inspection and copying upon request. §§ 6253(a)-(b).

55. When a member of the public submits a record request to an agency, the agency is given 10 days to determine whether the request seeks copies of disclosable public records in the possession of the agency and must promptly notify the requestor of that determination and the reasons therefor. § 6253(c). In statutorily-identified “unusual circumstances,” and “only to the extent reasonably necessary to the proper processing of the particular request,” this time period may be extended a maximum of 14 days. § 6253(c)-(d).

56. The law requires that agencies make non-exempt public records available to requestors “promptly.” § 6253(b). It is unlawful for an agency “to delay or obstruct the inspection of public records.” § 6253(d).

57. Where an agency withholds responsive records on the basis of a statutory exemption, “the agency . . . must disclose that fact.” *Haynie v. Super. Ct.* 26 Cal. 4th 1061, 1072 (2001) (citing § 6255). Even if portions of a document are exempt from disclosure, the agency must disclose the remainder of the document. § 6253(a).

58. Importantly, the agency bears the burden of justifying nondisclosure. § 6255(a). In determining whether exemptions apply, courts must follow the constitutional imperative that the applicability of exemptions must be construed narrowly and that the people's right of access to

1 public information must be construed broadly. Cal. Constitution, Art. I, § 3(b)(2).

2       59.     The CPRA also requires the government to “assist the member of the public [to]  
3 make a focused and effective request that reasonably describes an identifiable record or records” by  
4 taking steps to “[a]ssist the member of the public to identify records and information that are  
5 responsive to the request or to the purpose of the request, if stated.” § 6253.1. An agency that  
6 receives a request must also “[p]rovide suggestions for overcoming any practical basis for denying  
7 access to the records or information sought.” *Id.*

8       60.     Whenever it is made to appear by verified petition to the Superior Court of the  
9 county where the records or some part thereof are situated that certain public records are being  
10 improperly withheld from a member of the public, the Court shall order the officer or person  
11 charged with withholding the records to disclose the public record or show cause why he or she  
12 should not do so. The Court shall decide the case after examining the record in camera (if necessary  
13 and permitted by the Evidence Code), papers filed by the parties, and any oral argument and  
14 additional evidence as the Court may allow. § 6259(a). If the Court finds that the agency has not  
15 met its burden to justify its failure to disclose, it shall order the public official to make the record  
16 public. § 6259(b).

17       61.     A petitioner prevails under the CPRA where the petitioner shows that an agency  
18 unlawfully denied access to records. *Community Youth Athletic Center v. City of National City*, 220  
19 Cal.App.4th 1385, 1446-1447 (2013).

20       62.     An agency is not protected from liability merely because the denial of access was  
21 due to the agency’s internal logistical problems or general neglect of its duties. *Id.*

22       63.     Public policy favors judicial enforcement of the CPRA. The CPRA contains a  
23 mandatory attorney’s fee provision for the prevailing plaintiff. § 6259(d). The purpose of the  
24 provision is to provide “protections and incentives for members of the public to seek judicial  
25 enforcement of their right to inspect public records subject to disclosure.” *Filarsky v. Super. Ct.*, 28  
26 Cal.4th 419, 427 (2002).

27       **Respondent unlawfully denied access to all of Petitioner’s requested public records**

28       64.     Here, Petitioner submitted requests for clearly-identifiable public records that would

1 shed light on CD11's suspected involvement in the installation of planters in Venice, its actions  
2 related to homelessness generally, and its use of technology in its communications with the public.  
3 Respondent denied all access to these records, both by unlawfully withholding records under an  
4 inapplicable exemption and through impermissible delay and nonresponse.

5         65.       Respondent repeatedly failed to make a determination of disclosability within 10  
6 days of Petitioner's requests. *See* § 6253(c). Respondent failed to make a proper estimate as to when  
7 the requested records would be produced, as it repeatedly failed to meet its own estimated dates of  
8 production. *See id.* Respondent refused to provide emails in their native electronic format as  
9 required by law and instead created an unnecessary barrier to access by insisting on charging  
10 Respondent a fee to make physical copies of electronic records—before ultimately failing to  
11 provide the records in any format at all. *See* § 6253.9(a); *see also* § 6253(d) (it is unlawful for an  
12 agency “to delay or obstruct the inspection or copying of public records.”) Respondent invoked  
13 § 6255 without establishing that the public interest in withholding the requested records “clearly  
14 outweighs” the public interest in disclosure and refused to meet its obligation to assist Petitioner to  
15 formulate a request that would overcome any practical obstacles to production. *See* §§ 6253.1(a)(3),  
16 6255(a).

17         66.       Most critically, Respondent failed to provide even one public record in response to  
18 Petitioner's five requests despite Petitioner's repeated follow-up communications attempting to  
19 induce Respondent to produce the records as promised. To date, it has been nearly six months since  
20 Petitioner submitted his first request. By failing to produce the requested public records at all—let  
21 alone “promptly,” as required by law—Respondent is maintaining in a shroud of secrecy records  
22 that are of great public concern and shielding itself from public scrutiny. § 6253(b).

23         67.       Respondent's denial of access to public records not only violates the letter of the  
24 CPRA, but also its spirit. The CPRA is predicated on the principle that:

25               Openness in government is essential to the functioning of democracy. Implicit in  
26 the democratic process is the notion that government should be accountable for its  
27 actions. In order to verify accountability, individuals must have access to  
28 government files. Such access permits checks against the arbitrary exercise of  
official power and secrecy in the political process.



1 *Int'l Fed. Of Professional and Technical Engineers, Local 21, AFL-CIO v. Super. Ct.*, 42 Cal.4th  
2 319, 328-39 (2007) (internal quotations omitted).

3 68. It is unclear whether Respondent's refusal to produce these records is mere  
4 negligence or an actual attempt to hide its involvement in the installation of the planters from the  
5 public. Whatever Respondent's intent, the effect is the same—a complete lack of transparency  
6 around this hotly-debated issue, the obstruction of the democratic process, and a clear violation of  
7 the CPRA. Respondent's repeated and ongoing violations of the law require judicial intervention.

8 **A WRIT OF MANDATE AND DECLARATORY RELIEF ARE APPROPRIATE**

9 69. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 68  
10 above, as if set forth in full.

11 70. Petitioner is entitled to seek a writ of mandate and declaratory relief in response to  
12 violation of the CPRA. § 6258. Petitioner has no plain, speedy, adequate remedy in the ordinary  
13 course of law other than the relief sought in this petition. *See* Code of Civil Procedure § 1086.31.

14 71. Respondent has a clear, present, ministerial duty to comply with §§ 6250, *et seq.*  
15 Respondent has repeatedly acted and continues to act in violation of the CPRA by denying access to  
16 public information through impermissible delay, non-responsiveness, improper use of exemptions,  
17 and withholding records from the public. § 6253(b), (d).

18 72. Petitioner has performed all conditions precedent to filing this petition. There are no  
19 administrative exhaustion requirements under Government Code §§ 6250, *et seq.*

20 73. An actual controversy exists between the parties concerning whether Respondent has  
21 engaged in conduct that violates the statutory requirements of the CPRA. A judicial determination  
22 to resolve this actual controversy is necessary and appropriate at this time.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Petitioner prays for judgment as follows:

- 25 1. For issuance of a writ of mandate directing Respondent to provide Petitioner with all  
26 records he requested, except any records that the Court determines may lawfully be  
27 withheld;
- 28 2. For a declaration that Respondent violated the CPRA by its acts and omissions

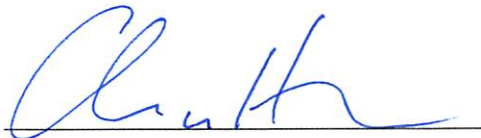
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described in this Petition;

- 3. For Petitioner to be awarded reasonable attorney’s fees and costs; and
- 4. For such other and further relief as the Court deems proper and just.

Dated: 6/9/19

Respectfully submitted,



ANNA VON HERRMANN  
Attorney for Petitioner and Plaintiff

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this the 9th day of June, 2019 in Los Angeles California.

ADRIAN RISKIN  
Petitioner and Plaintiff

## **INDEX OF EXHIBITS**

### **In Support of Verified Petition for Writ of Mandate and Complaint for Declaratory Relief Adrian Riskin vs. City of Los Angeles**

**EXHIBIT A:** True and accurate copies of communications between Petitioner and Respondent regarding Request 1

**EXHIBIT B:** True and accurate copies of communications between Petitioner and Respondent regarding Request 2

**EXHIBIT C:** True and accurate copies of communications between Petitioner and Respondent regarding Request 3

**EXHIBIT D:** True and accurate copies of communications between Petitioner and Respondent regarding Request 4

**EXHIBIT E:** True and accurate copies of communications between Petitioner and Respondent regarding Request 5

**EXHIBIT F:** True and accurate copy of email thread regarding Venice planter boxes, which is responsive to Petitioner's Request 1

# EXHIBIT A

**Subject:** Request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 12/26/18, 12:27 PM

**To:** "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "chad.molnar@lacity.org" <chad.molnar@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and these people OR with these (case insensitive) search terms:

1. Thanh Tran
2. Pam Giagni
3. Sam McGill
4. Carol Reynes
5. Rachel Plasencia
6. Mark Ryavec
7. Damji (search term)
8. "Lincoln Hardware" (search term)
9. Planter (search term)
10. Palms (search term)
11. Katie Dwyer
12. Kristan Delatori (LAPD 32914)
13. James Roberts (LAPD)

We are sorry that we do not know email addresses for the people. Maybe the last names are nonordinary enough to serve that purpose except for roberts?

**Subject:** Response to CPRA dated 12.26.2018  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 1/4/19, 4:31 PM  
**To:** westsidesunshinecoalition@yahoo.com  
**CC:** Chad Molnar <chad.molnar@lacity.org>, David Duran <david.duranflores@lacity.org>

Good Afternoon-

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated December 26, 2018. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after February 15, 2019 to arrange for a time to review the documents.

Thank you so much-  
Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
[213-473-7011](tel:213-473-7011) | [www.11thdistrict.com](http://www.11thdistrict.com)

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— Attachments: —

Westside Sunshine CPRA 12.26.18.pdf

77.0 kB



# MIKE BONIN

City of Los Angeles  
Councilmember, Eleventh District

January 4, 2019

Westside Sunshine

**Via email:** westsidesunshinecoalition@yahoo.com

Re: CPRA Request Dated 12.26.2018

Dear Westside Sunshine Coalition,

This office is in receipt of your email request for records under the California Public Records Act ("CPRA") dated December 26, 2018. The email included the request as stated below:

*"[A]ll 2018 emails between you and or your staff members and these people OR with these (case insensitive) search terms:*

1. *Thanh Tran*
2. *Pam Giagni*
3. *Sam McGill*
4. *Carol Reynes*
5. *Rachel Plasencia*
6. *Mark Ryavec*
7. *Damji (search term)*
8. *"Lincoln Hardware" (search term)*
9. *Planter (search term)*
10. *Palms (search term)*
11. *Katie Dwyer*
12. *Kristan Delatori (LAPD 32914)*
13. *James Roberts (LAPD)*

The CPRA requires that the local agency respond no later than 10 calendar days from the date the request is received as to whether the local agency has discloseable, responsive documents. If the 10th day falls on a weekend or holiday, the next business day is considered the deadline for responding to the request.

This letter constitutes our office's response regarding whether we possess responsive, discloseable records. Our office has records that are responsive to your request. We are currently compiling those responsive, discloseable documents and, upon completion, such documents will be made available for your review and/or copying.

You may make an appointment to review those documents during regular business hours at one of our offices prior to them being copied, or you may contact our office to receive an estimate of copying charges. Please contact David Duran Flores at 213-473-7011 on or after February 15, 2019, for information about estimated copying charges or to make an appointment for an

**Westchester Office**

7166 W. Manchester Boulevard  
Los Angeles, CA 90045  
(310) 568-8772  
(310) 410-3946 Fax

**City Hall**

200 N. Spring Street, Room 475  
Los Angeles, CA 90012  
(213) 473-7011  
(213) 473-6926 Fax

**West Los Angeles Office**

1645 Corinth Avenue, Room 201  
Los Angeles, CA 90025  
(310) 575-8461  
(310) 575-8305 Fax



available date after February 15th to review the documents. Please be advised that the cost of copying is \$0.10/page.

Regards,



**KRISTA KLINE**

*Deputy Chief of Staff, Council District 11*

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 2/15/19, 9:32 PM  
**To:** Krista Kline <krista.kline@lacity.org>  
**CC:** Chad Molnar <chad.molnar@lacity.org>, David Duran <david.duranflores@lacity.org>

Hi Ms. Kline!

I am getting in touch with you as instructed. Please advise!

On Friday, January 4, 2019, 4:31:43 PM PST, Krista Kline <krista.kline@lacity.org> wrote:

Good Afternoon-

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated December 26, 2018. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after February 15, 2019 to arrange for a time to review the documents.

Thank you so much-

Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

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**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 2/27/19, 7:50 PM  
**To:** Krista Kline <krista.kline@lacity.org>  
**CC:** Chad Molnar <chad.molnar@lacity.org>, David Duran <david.duranflores@lacity.org>

Hi Ms. Kline!

I am really starting to wonder what is going on with this request since it's two (2) weeks after you said you would get that material ready!

On Friday, February 15, 2019, 9:32:48 PM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline!

I am getting in touch with you as instructed. Please advise!

On Friday, January 4, 2019, 4:31:43 PM PST, Krista Kline <krista.kline@lacity.org> wrote:

Good Afternoon-

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated December 26, 2018. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after February 15, 2019 to arrange for a time to review the documents.

Thank you so much-

Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

City of Los Angeles

213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 2/28/19, 8:24 AM  
**To:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

My apologies. I'll need another week in order to get your request in order. Please reach out to David early next week to schedule time to review the documents. Thanks so much for your patience-  
-Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
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On Wed, Feb 27, 2019 at 7:50 PM Westside Sunshine  
<[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hi Ms. Kline!

I am really starting to wonder what is going on with this request since it's two (2) weeks after you said you would get that material ready!

On Friday, February 15, 2019, 9:32:48 PM PST, Westside Sunshine <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hi Ms. Kline!

I am getting in touch with you as instructed. Please advise!

On Friday, January 4, 2019, 4:31:43 PM PST, Krista Kline <[krista.kline@lacity.org](mailto:krista.kline@lacity.org)> wrote:

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** westsidesunshinecoalition@yahoo.com  
**Date:** 2/28/19, 8:35 AM  
**To:** "Krista Kline" <krista.kline@lacity.org>

Thanks for your response! Am I to reach out to a particular David or a David of my choice?

On Thu, Feb 28, 2019, at 8:26 AM, Krista Kline wrote:

My apologies. I'll need another week in order to get your request in order. Please reach out to David early next week to schedule time to review the documents.

Thanks so much for your patience-

-Krista

**\*Krista Kline\***

**\*Deputy Chief of Staff\***

Councilmember Mike Bonin

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<<https://play.google.com/store/apps/details?id=com.LA.MyLA311>>

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 2/28/19, 8:41 AM  
**To:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

So sorry! I thought you knew (he was included as a recipient to your email):  
David Duran Flores.  
-Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
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On Thu, Feb 28, 2019 at 8:37 AM <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Thanks for your response! Am I to reach out to a particular David or a David of my choice?

On Thu, Feb 28, 2019, at 8:26 AM, Krista Kline wrote:

> My apologies. I'll need another week in order to get your request in  
> order. Please reach out to David early next week to schedule time to  
> review the documents.  
> Thanks so much for your patience-  
> -Krista  
> \*Krista Kline\*  
> \*Deputy Chief of Staff\*  
> Councilmember Mike Bonin  
> City of Los Angeles  
> 213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)  
>  
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>

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 3/8/19, 4:00 PM  
**To:** Krista Kline <krista.kline@lacity.org>

Hi Ms. Kline I am just checking up on this. When can I come see this material? Can you forward this to David b/c I can't find his email address.

On Thursday, February 28, 2019, 8:42:01 AM PST, Krista Kline <krista.kline@lacity.org> wrote:

So sorry! I thought you knew (he was included as a recipient to your email): David Duran Flores.  
-Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
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On Thu, Feb 28, 2019 at 8:37 AM <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:  
| Thanks for your response! Am I to reach out to a particular David or a David of my choice?

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 3/14/19, 6:14 AM  
**To:** Krista Kline <krista.kline@lacity.org>

Hi Ms. Kline I am beginning to feel ignored here. You told me to get in touch with you a number of times and now you're not answering at all. Is this material ready or not?

On Friday, March 8, 2019, 4:00:11 PM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline I am just checking up on this. When can I come see this material? Can you forward this to David b/c I can't find his email address.

On Thursday, February 28, 2019, 8:42:01 AM PST, Krista Kline <krista.kline@lacity.org> wrote:

So sorry! I thought you knew (he was included as a recipient to your email): David Duran Flores.  
-Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
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**Subject:** Fw: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 3/18/19, 10:35 AM  
**To:** Krista Kline <krista.kline@lacity.org>, Chad Molnar <chad.molnar@lacity.org>, City of Los Angeles <councilmember.bonin@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Hi Ms. Kline,

You said probably this would be ready a really long time ago, maybe it is ready now?

thank you!

P.S. can you forward this to David b/c not sure of his email address

On Thursday, March 14, 2019, 6:14:26 AM PDT, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline I am beginning to feel ignored here. You told me to get in touch with you a number of times and now you're not answering at all. Is this material ready or not?

On Friday, March 8, 2019, 4:00:11 PM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline I am just checking up on this. When can I come see this material? Can you forward this to David b/c I can't find his email address.

On Thursday, February 28, 2019, 8:42:01 AM PST, Krista Kline <krista.kline@lacity.org> wrote:

So sorry! I thought you knew (he was included as a recipient to your email): David Duran Flores.  
-Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

City of Los Angeles

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**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 3/25/19, 3:57 PM  
**To:** Krista Kline <krista.kline@lacity.org>, Chad Molnar <chad.molnar@lacity.org>, City of Los Angeles <councilmember.bonin@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>, David Duran <david.duranflores@lacity.org>

Hi Ms. Kline,

I wonder why you would tell me this would be ready three weeks ago and then not answer me any more?

thank you?

P.s.

On Monday, March 18, 2019, 10:35:20 AM PDT, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline,

You said probably this would be ready a really long time ago, maybe it is ready now?

thank you!

P.S. can you forward this to David b/c not sure of his email address

On Thursday, March 14, 2019, 6:14:26 AM PDT, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline I am beginning to feel ignored here. You told me to get in touch with you a number of times and now you're not answering at all. Is this material ready or not?

On Friday, March 8, 2019, 4:00:11 PM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline I am just checking up on this. When can I come see this material? Can you forward this to David b/c I can't find his email address.

On Thursday, February 28, 2019, 8:42:01 AM PST, Krista Kline <krista.kline@lacity.org> wrote:

**Subject:** Re: Response to CPRA dated 12.26.2018  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 4/11/19, 7:28 PM  
**To:** Krista Kline <krista.kline@lacity.org>, Chad Molnar <chad.molnar@lacity.org>, City of Los Angeles <councilmember.bonin@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>, David Duran <david.duranflores@lacity.org>

Good day all!

Wondering what is up with this one, four months old now, the world hungers for this information, Council district 11!

Thanks for your prompt helpful ness.

On 3/25/19 3:57 PM, Westside Sunshine wrote:

Hi Ms. Kline,

I wonder why you would tell me this would be ready three weeks ago and then not answer me any more?

thank you?

P.s.

On Monday, March 18, 2019, 10:35:20 AM PDT, Westside Sunshine <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hi Ms. Kline,

You said probably this would be ready a really long time ago, maybe it is ready now?

thank you!

P.S. can you forward this to David b/c not sure of his email address

On Thursday, March 14, 2019, 6:14:26 AM PDT, Westside Sunshine <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hi Ms. Kline I am beginning to feel ignored here. You told me to get in touch with you a number of times and now you're not answering at all. Is this material ready or not?

# **EXHIBIT B**

**Subject:** Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 12/27/18, 10:05 AM

**To:** "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "chad.molnar@lacity.org" <chad.molnar@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.

Re: Another request under the california public r...

**Subject:** Re: Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 3/8/19, 4:01 PM

**To:** "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "chad.molnar@lacity.org" <chad.molnar@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>, Krista Kline <krista.kline@lacity.org>

Hi Ms. Kline,

I'm not clear on whether you meant to include this one with the other one that I was supposed to contact david about. Is this one done also?

On Thursday, December 27, 2018, 10:05:42 AM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.

Re: Another request under the california public r...

**Subject:** Re: Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 3/14/19, 6:13 AM

**To:** "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>, "chad.molnar@lacity.org" <chad.molnar@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>, Krista Kline <krista.kline@lacity.org>

Hi Ms.Kline just asking about status of this.

On Friday, March 8, 2019, 4:01:53 PM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline,

I'm not clear on whether you meant to include this one with the other one that I was supposed to contact david about. Is this one done also?

On Thursday, December 27, 2018, 10:05:42 AM PST, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.

**Subject:** Fw: Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 3/18/19, 10:38 AM

**To:** Krista Kline <krista.kline@lacity.org>, Chad Molnar <chad.molnar@lacity.org>, City of Los Angeles <councilmember.bonin@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Hi Ms. Kline,

Seems perhaps this one you didn't respond to? Either way, am asking what is the status of it, thank you.

----- Forwarded Message -----

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**To:** councilmember.bonin@lacity.org <councilmember.bonin@lacity.org>; chad.molnar@lacity.org <chad.molnar@lacity.org>; tricia.keane@lacity.org <tricia.keane@lacity.org>

**Sent:** Thursday, December 27, 2018, 10:05:42 AM PST

**Subject:** Another request under the california public records act for emails of council district eleven staff

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.



**Subject:** Re: Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 3/25/19, 3:55 PM

**To:** Krista Kline <krista.kline@lacity.org>, Chad Molnar <chad.molnar@lacity.org>, City of Los Angeles <councilmember.bonin@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Hi Ms. Kline,

I am wondering what the status of this request is.

Thank you.

On Monday, March 18, 2019, 10:38:24 AM PDT, Westside Sunshine <westsidesunshinecoalition@yahoo.com> wrote:

Hi Ms. Kline,

Seems perhaps this one you didn't respond to? Either way, am asking what is the status of it, thank you.

----- Forwarded Message -----

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**To:** councilmember.bonin@lacity.org <councilmember.bonin@lacity.org>; chad.molnar@lacity.org <chad.molnar@lacity.org>; tricia.keane@lacity.org <tricia.keane@lacity.org>

**Sent:** Thursday, December 27, 2018, 10:05:42 AM PST

**Subject:** Another request under the california public records act for emails of council district eleven staff

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.

**Subject:** Re: Fw: Another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)>

**Date:** 4/11/19, 7:30 PM

**To:** Krista Kline <[krista.kline@lacity.org](mailto:krista.kline@lacity.org)>, Chad Molnar <[chad.molnar@lacity.org](mailto:chad.molnar@lacity.org)>, David Duran <[david.duranflores@lacity.org](mailto:david.duranflores@lacity.org)>, "tricia.keane@lacity.org" <[tricia.keane@lacity.org](mailto:tricia.keane@lacity.org)>

Good evening Council district 11.

I am just wondering what is going on with this request, it's coming up on four months now.

Thank you!

On 3/18/19 10:38 AM, Westside Sunshine wrote:

Hi Ms. Kline,

Seems perhaps this one you didn't respond to? Either way, am asking what is the status of it, thank you.

----- Forwarded Message -----

**From:** Westside Sunshine <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)>

**To:** [councilmember.bonin@lacity.org](mailto:councilmember.bonin@lacity.org) <[councilmember.bonin@lacity.org](mailto:councilmember.bonin@lacity.org)>; [chad.molnar@lacity.org](mailto:chad.molnar@lacity.org) <[chad.molnar@lacity.org](mailto:chad.molnar@lacity.org)>; [tricia.keane@lacity.org](mailto:tricia.keane@lacity.org) <[tricia.keane@lacity.org](mailto:tricia.keane@lacity.org)>

**Sent:** Thursday, December 27, 2018, 10:05:42 AM PST

**Subject:** Another request under the california public records act for emails of council district eleven staff

Hello Mr.Bonin. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2018 emails between you and or your staff members and Saul Janson. We are sorry that we do not know email addresses for this person, thank you.

# **EXHIBIT C**

Yet another request under the california public re...

**Subject:** Yet another request under the california public records act for emails of council district eleven staff  
**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>  
**Date:** 2/19/19, 5:45 PM  
**To:** Krista Kline <krista.kline@lacity.org>

Hello Ms. Kline. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2016 through 2019 emails between electeds and staff members at your council district, that is to say number eleven, and George Francisco at any email address but including gianfrancisco@hotmail.com. We are sorry that we do not know all email addresses for this person, thank you.

**Subject:** Re: Yet another request under the california public records act for emails of council district eleven staff  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 2/28/19, 12:34 PM  
**To:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

Good Afternoon!

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated February 19, 2019. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after March 29, 2019 to arrange for a time to review the documents.

Thank you so much-  
Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
[213-473-7011](tel:213-473-7011) | [www.11thdistrict.com](http://www.11thdistrict.com)

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MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

On Tue, Feb 19, 2019 at 5:45 PM Westside Sunshine  
<[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hello Ms. Kline. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more transparency yields better government for all. At a recent meeting we determined that it would be really useful for us to look at all 2016 through 2019 emails between electeds and staff members at your council district, that is to say number eleven, and George Francisco at any email address but including [gianfrancisco@hotmail.com](mailto:gianfrancisco@hotmail.com). We are sorry that we do not know all email addresses for this person, thank you.

---

— Attachments: —



# MIKE BONIN

City of Los Angeles  
Councilmember, Eleventh District

February 28, 2019

Westside Sunshine Coalition

**Via email:** westsidesunshinecoalition@yahoo.com

**Re:** CPRA Request Dated 02.19.2019

Dear Westside Sunshine Coalition,

This office is in receipt of your email request for records under the California Public Records Act ("CPRA") dated February 19, 2019. The email included the request as stated below:

*All 2016 through 2019 emails between electeds and staff members at your council district, and George Francisco at any email address but including [gianfrancisco@hotmail.com](mailto:gianfrancisco@hotmail.com).*

The CPRA requires that the local agency respond no later than 10 calendar days from the date the request is received as to whether the local agency has discloseable, responsive documents. If the 10th day falls on a weekend or holiday, the next business day is considered the deadline for responding to the request.

This letter constitutes our office's response regarding whether we possess responsive, discloseable records. Our office has records that are responsive to your request. We are currently compiling those responsive, disclosable documents and, upon completion, such documents will be made available for your review and/or copying.

You may make an appointment to review those documents during regular business hours at one of our offices prior to them being copied, or you may contact our office to receive an estimate of copying charges. Please contact David Duran Flores at 213-473-7011 on or after March 29, 2019, for information about estimated copying charges or to make an appointment for an available date after March 29th to review the documents. Please be advised that the cost of copying is \$0.10/page.

Regards,

**Krista Kline**

*Deputy Chief of Staff, Council District 11*

**Westchester Office**

7166 W. Manchester Boulevard  
Los Angeles, CA 90045  
(310) 568-8772  
(310) 410-3946 Fax

**City Hall**

200 N. Spring Street, Room 475  
Los Angeles, CA 90012  
(213) 473-7011  
(213) 473-6926 Fax

**West Los Angeles Office**

1645 Corinth Avenue, Room 201  
Los Angeles, CA 90025  
(310) 575-8461  
(310) 575-8305 Fax



Re: Yet another request under the california publi...

**Subject:** Re: Yet another request under the california public records act for emails of council district eleven staff  
**From:** westsidesunshinecoalition@yahoo.com  
**Date:** 2/28/19, 4:30 PM  
**To:** "Krista Kline" <krista.kline@lacity.org>

Dear Ms. Kline,

These are quintessentially electronic records. Please commit to following the law by emailing them to me as attachments rather than forcing me to "review" them, whatever that might mean. Also, please consider that there's no theory under which these records could conceivably be exempt, so that a net production time of more than six weeks is indefensible. Just sayin'

On Thu, Feb 28, 2019, at 12:40 PM, Krista Kline wrote:

Good Afternoon!

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated February 19, 2019. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after March 29, 2019 to arrange for a time to review the documents.

Thank you so much-

Krista

**\*Krista Kline\***

**\*Deputy Chief of Staff\***

Councilmember Mike Bonin

City of Los Angeles

213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)

<https://www.facebook.com/MikeBoninCD11/> <<http://www.twitter.com/mikeboninla>>

Sign Up for Mike's Email Updates <[http://www.11thdistrict.com/sign\\_up](http://www.11thdistrict.com/sign_up)>

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**Subject:** Re: Yet another request under the california public records act for emails of council district eleven staff  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 2/28/19, 4:49 PM  
**To:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

The law does not require that the documents be sent electronically. In addition, there is no need for you to review any documents we provide. We are happy to provide hard copies, at 10 cents a page, for you and you can pick them up.

The allotted time frame that we can make the documents available to you is March 29, 2019 because staff must find relevant documents and print them, and then I must review them. This is a very broad request, not limited by any specific topic or issue; therefore, we anticipate hundreds of pages of documents.

Thank you-  
-Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

City of Los Angeles

[213-473-7011](tel:213-473-7011) | [www.11thdistrict.com](http://www.11thdistrict.com)

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On Thu, Feb 28, 2019 at 4:32 PM <[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Dear Ms. Kline,

These are quintessentially electronic records. Please commit to following the law by emailing them to me as attachments rather than forcing me to "review" them, whatever that might mean. Also, please consider that there's no theory under which these records could conceivably be exempt, so that a net production time of more than six weeks is indefensible. Just sayin'

On Thu, Feb 28, 2019, at 12:40 PM, Krista Kline wrote:



Re: Yet another request under the california publi...

**Subject:** Re: Yet another request under the california public records act for emails of council district eleven staff  
**From:** westsidesunshinecoalition@yahoo.com  
**Date:** 2/28/19, 4:58 PM  
**To:** "Krista Kline" <krista.kline@lacity.org>

Hi Ms. Kline,

The CPRA at 6253.9 requires that you provide electronic copies of electronic documents. If you have some other way to send electronic documents other than electronically I am interested to hear about it. Now it's possible that the law doesn't require that the electronic files be sent by return email but it does require that they be sent electronically some how.

So actually the law actually forbids you from requiring me to accept printed copies. And if you're proposing to print them out and then scan them please note that that's not in compliance either. The same section of CPRA requires that you provide them in the format that the city stores them in, which for Gmail is mbox.

Now I understand from my colleagues that the city of los angeles doesn't allow end users to export mbox so we are willing to accept pdfs like most city people provide but it's a violation of the law to require paper and it's a violation of the law to charge per page of paper when the "direct cost" of making electronic files available electronically is nothing.

thanks for your help!

On Thu, Feb 28, 2019, at 4:53 PM, Krista Kline wrote:

The law does not require that the documents be sent electronically. In addition, there is no need for you to review any documents we provide. We are happy to provide hard copies, at 10 cents a page, for you and you can pick them up. The allotted time frame that we can make the documents available to you is March 29, 2019 because staff must find relevant documents and print them, and then I must review them. This is a very broad request, not limited by any specific topic or issue; therefore, we anticipate hundreds of pages of documents. Thank you-

-Krista

**\*Krista Kline\***

**\*Deputy Chief of Staff\***

Councilmember Mike Bonin

City of Los Angeles

213-473-7011 | [www.11thdistrict.com](http://www.11thdistrict.com)

<https://www.facebook.com/MikeBoninCD11/> <http://www.twitter.com/mikeboninla>

Sign Up for Mike's Email Updates [http://www.11thdistrict.com/sign\\_up](http://www.11thdistrict.com/sign_up)

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**Subject:** Re: Yet another request under the california public records act for emails of council district eleven staff

**From:** Westside Sunshine <westsidesunshinecoalition@yahoo.com>

**Date:** 4/11/19, 7:25 PM

**To:** Krista Kline <krista.kline@lacity.org>, david.duranflores@lacity.org

Council district 11, I'm wondering what is the status of this matter?

thank you Council district 11.

On 2/28/19 12:34 PM, Krista Kline wrote:

Good Afternoon!

We are in receipt of your email request for records under the California Public Records Act ("CPRA") dated February 19, 2019. We are in the process of gathering and reviewing potentially responsive documents, and ask that you contact our office on or after March 29, 2019 to arrange for a time to review the documents.

Thank you so much-

Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

City of Los Angeles

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MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

On Tue, Feb 19, 2019 at 5:45 PM Westside Sunshine  
<[westsidesunshinecoalition@yahoo.com](mailto:westsidesunshinecoalition@yahoo.com)> wrote:

Hello Ms. Kline. I am writing on behalf of the Westside Sunshine Coalition. We are a group of citizens who are dedicated to the proposition that more

# **EXHIBIT D**

**Subject:** Requestion of public records

**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>

**Date:** 2/18/19, 7:40 AM

**To:** "councilmember.bonin@lacity.org" <councilmember.bonin@lacity.org>

1. List of all official Twitter accounts used by council office
  2. List of all accounts blocked or muted by those official Twitter accounts
- thank you

Sent from [Outlook](#)

**Subject:** Fwd: Requestion of public records  
**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>  
**Date:** 4/14/19, 7:24 AM  
**To:** Krista Kline <krista.kline@lacity.org>, "tricia.keane@lacity.org" <tricia.keane@lacity.org>

Good morning CD11 am still awaiting eagerly the results of this matter.

----- Forwarded Message -----

**Subject:** Requestion of public records  
**Date:** Mon, 18 Feb 2019 07:40:22 -0800  
**From:** Westlake Investigations <[westlakeinvestigations@hotmail.com](mailto:westlakeinvestigations@hotmail.com)>  
**To:** [councilmember.bonin@lacity.org](mailto:councilmember.bonin@lacity.org) <[councilmember.bonin@lacity.org](mailto:councilmember.bonin@lacity.org)>

1. List of all official Twitter accounts used by council office
  2. List of all accounts blocked or muted by those official Twitter accounts
- thank you

Sent from [Outlook](#)

**Subject:** Fwd: Fwd: Requestion of public records  
**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>  
**Date:** 4/30/19, 7:37 PM  
**To:** hannah.levien@lacity.org

Hi Ms. Levien your name was suggested to me as one at CD11 who will actually answer requests for public records unlike as you can see your colleagues are unwilling to do. Can you have a talk with them b/c this is now like more than ten weeks old, no response, very, very against the law!

Thank you.

----- Forwarded Message -----

**Subject:** Fwd: Requestion of public records  
**Date:** Sun, 14 Apr 2019 07:24:52 -0700  
**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>  
**To:** Krista Kline <krista.kline@lacity.org>, tricia.keane@lacity.org  
<tricia.keane@lacity.org>

Good morning CD11 am still awaiting eagerly the results of this matter.

----- Forwarded Message -----

**Subject:** Requestion of public records  
**Date:** Mon, 18 Feb 2019 07:40:22 -0800  
**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>  
**To:** <councilmember.bonin@lacity.org> <councilmember.bonin@lacity.org>

1. List of all official Twitter accounts used by council office
2. List of all accounts blocked or muted by those official Twitter accounts

thank you

Sent from [Outlook](#)

# **EXHIBIT E**

**Subject:** Requestion PRA please  
**From:** westlakeinvestigations@hotmail.com  
**Date:** 3/1/19, 2:50 PM  
**To:** "Krista Kline" <krista.kline@lacity.org>

Good day Ms. Kline,

I am write to ask for opportunity to obtain electric copies of all Romulus logs and reports from January 1, 2018 till now. According to Seneca Systems website this would include:

- \* Log and archive all communications to and from constituents in Romulus automatically, no matter the source or the time that has passed
- \* Create issue reports about major policy, governance, and legislative issues facing constituencies.
- \* Obtain all reports out of the box without any complex configuration.
- \* View and export reports that demonstrate the work that government workers are doing and constituent satisfaction achieved.
- \* Out-of-the-box reporting offers instant insights into constituent trends and service performance, allowing recognition of great work and trends to be corrected before they're problems.

Thank you Ms. Kline.



**Subject:** Re: Requestion PRA please  
**From:** Krista Kline <krista.kline@lacity.org>  
**Date:** 3/11/19, 5:00 PM  
**To:** Westlake Investigations <westlakeinvestigations@hotmail.com>

Please see CPRA response letter attached.  
Thank you so much-  
-Krista

**Krista Kline**  
*Deputy Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
[213-473-7011](tel:213-473-7011) | [www.11thdistrict.com](http://www.11thdistrict.com)

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MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

On Fri, Mar 1, 2019 at 2:50 PM Westlake Investigations  
<[westlakeinvestigations@hotmail.com](mailto:westlakeinvestigations@hotmail.com)> wrote:

Good day Ms. Kline,

I am write to ask for opportunity to obtain electric copies of all Romulus logs and reports from January 1, 2018 till now. According to Seneca Systems website this would include:

- \* Log and archive all communications to and from constituents in Romulus automatically, no matter the source or the time that has passed
- \* Create issue reports about major policy, governance, and legislative issues facing constituencies.
- \* Obtain all reports out of the box without any complex configuration.
- \* View and export reports that demonstrate the work that government workers are doing and constituent satisfaction achieved.



# MIKE BONIN

City of Los Angeles  
Councilmember, Eleventh District

March 11, 2019

Westlake Investigations

**Via email:** westlakeinvestigations@hotmail.com

Re: CPRA Request Dated 03.01.2019

Dear Westlake Investigations,

This office is in receipt of your email request for records under the California Public Records Act ("CPRA") dated March 1, 2019. The email included the request as stated below:

*Electric copies of all Romulus logs and reports from January 1, 2018 till now. According to Seneca Systems website this would include:*

- 1. Log and archive all communications to and from constituents in Romulus automatically, no matter the source or the time that has passed*
- 2. Create issue reports about major policy, governance, and legislative issues facing constituencies.*
- 3. Obtain all reports out of the box without any complex configuration.*
- 4. View and export reports that demonstrate the work that government workers are doing and constituent satisfaction achieved.*
- 5. Out-of-the-box reporting offers instant insights into constituent trends and service performance, allowing recognition of great work and trends to be corrected before they're problems.*

The CPRA requires that the local agency respond no later than 10 calendar days from the date the request is received as to whether the local agency has discloseable, responsive documents. If the 10th day falls on a weekend or holiday, the next business day is considered the deadline for responding to the request.

This letter serves as our office's response within the required 10-day time period, and confirms that sub-request (1) above is overly voluminous, per Section 6255(a). Regarding sub-requests (2), (3), (4), and (5), we have confirmed that our office does not possess any discloseable, responsive records.

Regards,

**Krista Kline**

*Deputy Chief of Staff, Council District 11*

**Westchester Office**

7166 W. Manchester Boulevard  
Los Angeles, CA 90045  
(310) 568-8772  
(310) 410-3946 Fax

**City Hall**

200 N. Spring Street, Room 475  
Los Angeles, CA 90012  
(213) 473-7011  
(213) 473-6926 Fax

**West Los Angeles Office**

1645 Corinth Avenue, Room 201  
Los Angeles, CA 90025  
(310) 575-8461  
(310) 575-8305 Fax

Re: Requestion PRA please

**Subject:** Re: Requestion PRA please

**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>

**Date:** 3/11/19, 5:15 PM

**To:** Krista Kline <krista.kline@lacity.org>

Dear Ms. Kline,

"Overly voluminous" is not any kind of exemption, not even found in the expansive 6255(a). It may be that your office is unwilling to do the work to produce this material but there has to be a reason in the public interest beyond an unelaborated "overly voluminous."

In any case, why don't you assist me in making this request just the right size of voluminous as you're required to do by the Pub. Rec. Act at 6253.1(a)(3). For instance, tell me how much material there is in response to my request, why it is that your office is unwilling to produce it, like do you have to redact it or something, and then assist me in overcoming these obstacles, like tell me how much of it your office would consider not "overly voluminous" and therefore would be willing to produce and stuff like that?

Thank you Ms. Kline!

Sent from [Outlook](#)

---

**From:** Krista Kline <krista.kline@lacity.org>

**Sent:** Monday, March 11, 2019 5:00 PM

**To:** Westlake Investigations

**Subject:** Re: Requestion PRA please

Please see CPRA response letter attached.

Thank you so much-

-Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

City of Los Angeles

[213-473-7011](tel:213-473-7011)

|

[www.11thdistrict.com](http://www.11thdistrict.com)

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**Subject:** Re: Requestion PRA please

**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>

**Date:** 3/26/19, 7:51 PM

**To:** Krista Kline <krista.kline@lacity.org>

Good day, Ms. Kline.

I am eagerly awaiting your required assistance in overcoming the obstacles on this. Not optional on your part. Mandatory. Please reply soon.

Thank you!

Sent from [Outlook](#)

On 3/11/19 5:15 PM, Westlake Investigations wrote:

Dear Ms. Kline,

"Overly voluminous" is not any kind of exemption, not even found in the expansive 6255(a). It may be that your office is unwilling to do the work to produce this material but there has to be a reason in the public interest beyond an unelaborated "overly voluminous."

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Thank you Ms. Kline!

Sent from [Outlook](#)

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**From:** Krista Kline <[krista.kline@lacity.org](mailto:krista.kline@lacity.org)>

**Sent:** Monday, March 11, 2019 5:00 PM

**To:** Westlake Investigations

**Subject:** Re: Requestion PRA please

Please see CPRA response letter attached.

Thank you so much-

-Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

**Subject:** Re: Requestion PRA please

**From:** westlakeinvestigations <westlakeinvestigations@hotmail.com>

**Date:** 4/3/19, 11:37 AM

**To:** Krista Kline <krista.kline@lacity.org>

Ms. Kline, good morning!

I saw on Twitter yesterday that your boss is a champion of the vulnerable. could you consider that complying with this law, the C.P.R.A. is an important way to protect the vulnerable?

And thereby protect the vulnerable by answering my email and helping me to make an effective request, "effective" meaning "one which CD11 will supply records in response to"?

Thank you

On 3/26/19 7:51 PM, Westlake Investigations wrote:

Good day, Ms. Kline.

I am eagerly awaiting your required assistance in overcoming the obstacles on this. Not optional on your part. Mandatory. Please reply soon.

Thank you!

Sent from [Outlook](#)

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Thank you Ms. Kline!

Sent from [Outlook](#)

**Subject:** Re: Requestion PRA please

**From:** Westlake Investigations <westlakeinvestigations@hotmail.com>

**Date:** 4/30/19, 7:38 PM

**To:** hannah.levien@lacity.org

This one too maybe you could take a look at Ms. Levien? Ms. Kline won't help me get an effective request like the law says she must. Will you?

On 4/3/19 11:37 AM, westlakeinvestigations wrote:

Ms. Kline, good morning!

I saw on Twitter yesterday that your boss is a champion of the vulnerable. could you consider that complying with this law, the C.P.R.A. is an important way to protect the vulnerable?

And thereby protect the vulnerable by answering my email and helping me to make an effective request, "effective" meaning "one which CD11 will supply records in response to"?

Thank you

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Sent from [Outlook](#)

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Dear Ms. Kline,

"Overly voluminous" is not any kind of exemption, not even found in the expansive 6255(a). It may be that your office is unwilling to do the work to produce this material but there has

**Subject:** Re: Requestion PRA please

**From:** Krista Kline <krista.kline@lacity.org>

**Date:** 5/15/19, 9:12 AM

**To:** Westlake Investigations <westlakeinvestigations@hotmail.com>

Our office has responded to that request. Thank you.

For your information: Our point person on CPRA requests at this time is Yurida Ramos. You can direct any questions at her.

-Krista

**Krista Kline**

*Deputy Chief of Staff*

Councilmember Mike Bonin

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MyLA311 links Angelenos with the services and information they need to enjoy their city, beautify their community and stay connected with their local government. With MyLA311, City of Los Angeles information and services are just a few taps away.

On Wed, Apr 3, 2019 at 11:37 AM Westlake Investigations  
<[westlakeinvestigations@hotmail.com](mailto:westlakeinvestigations@hotmail.com)> wrote:

Ms. Kline, good morning!

I saw on Twitter yesterday that your boss is a champion of the vulnerable. could you consider that complying with this law, the C.P.R.A. is an important way to protect the vulnerable?

And thereby protect the vulnerable by answering my email and helping me to make an effective request, "effective" meaning "one which CD11 will supply records in response to"?

# **EXHIBIT F**



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**From:** brian.buchner@lacity.org on behalf of Mayor UHRC <uhrc@lacity.org>  
**Sent:** Friday, November 02, 2018 12:30 PM  
**To:** Taylor Bazley;Emada Tingirides  
**Cc:** Javier Ramirez;Marco Ramirez;Robert Chellew;Salvador Rosales;Steven Pedersen;Gonzalo Barriga;Monique Contreras;Celina Robles;Brian Buchner  
**Subject:** Re: Harding Ave./Lincoln Blvd. Beautification Project

Understood, Taylor.

Emada, can you please confirm if West Bureau HOPE visited the location? Also, copying LASAN to ensure coordination between the Council Office, the UHRC, and departments.

Thanks.

Brian

On Thu, Nov 1, 2018 at 6:44 PM, Taylor Bazley <[taylor.bazley@lacity.org](mailto:taylor.bazley@lacity.org)> wrote:

We need a posted clean up as soon as possible. I am already asking LASAN to prioritize the location and it would be helpful to get sooner than later.

Thanks -  
Taylor

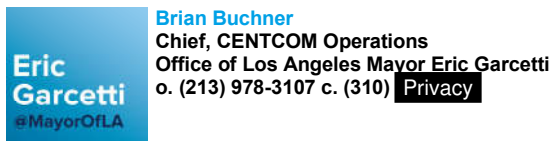
On Wed, Oct 31, 2018 at 10:08 AM Mayor UHRC <[uhrc@lacity.org](mailto:uhrc@lacity.org)> wrote:  
Hi Taylor,

We'll have the West Bureau HOPE Team address the location. Copying Lt. Emada TIngirides on this email chain.

Thanks.

Brian Buchner

--



On Tue, Oct 30, 2018 at 4:27 PM, Taylor Bazley <[taylor.bazley@lacity.org](mailto:taylor.bazley@lacity.org)> wrote:  
Hi UHRC -

I needed some help coordinating a clean up at Harding just West of Lincoln Blvd. in Venice.

-Taylor

----- Forwarded message -----

From: **Carlos Torres** <[redacted] Privacy >

Date: Tue, Oct 30, 2018 at 3:01 PM

Subject: Re: Harding Ave./Lincoln Blvd. Beautification Project

To: venicestakeholders <[redacted] Privacy >, Taylor Bazley <[taylor.bazley@lacity.org](mailto:taylor.bazley@lacity.org)>, James Setzer <[31260@lapd.online](mailto:31260@lapd.online)>

Cc: [redacted] Privacy >, [redacted] Privacy >, [redacted] Privacy >

[redacted] Privacy >, Mike Castillo <[redacted] Privacy >, James Roberts <[31381@lapd.online](mailto:31381@lapd.online)>, Javier Ramirez <[39174@lapd.online](mailto:39174@lapd.online)>, Kristan Delatori

<[32914@lapd.online](mailto:32914@lapd.online)>, Michael Soliman <[32906@lapd.online](mailto:32906@lapd.online)>, Kevin Lowe <[27614@lapd.online](mailto:27614@lapd.online)>

The situation here is deplorable, is so frustrating to be left out in the cold like this, Our SLO Officer Ramirez was in the process of coordinating a day with Sanitation so we could install the planters, we have the planters, we have the plants, we have the people to come and do the labor, all we need is for our Officials to come and help us clear the area so we can do the work, !!! Is been 5 months of us residents fighting this battle, is just not fair, we are exahusted, we are frustrated, we feel helpless.

Officer Ramirez what happened? you said you were going to help us. You are not returning our calls or emails when you said we will be ready to proceed this week. We have done our part where are you?

Please Captain James help us residents, is not our fault, we pay taxes, we been patient, we raised our own funds, we have been doing the hard work and will continue, all we need is for our SLO to help us one day to clean that area. We have integrity and we are hoping that our officials do too.

I'm trusting that we will resolve this soon, for everyone's sake. I'm sure you don't want to be bother everyday with this same issue and we are desperate to have a decent life here.

Sincerely

Charlie T

On Tuesday, October 23, 2018, 7:30:01 PM PDT, James Setzer <[31260@lapd.online](mailto:31260@lapd.online)> wrote:

Good evening all:

Barring the unforeseen, the LAPD can plan on providing a unit to engage these persons and seek their voluntary compliance.

I'll confirm unit availability and awareness by the SLO for this effort.

Respectfully,

Jim Setzer

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---

**From:** venicestakeholders [Privacy] >  
**Sent:** Tuesday, October 23, 2018 19:17  
**To:** Taylor Bazley  
**Cc:** [Privacy]; Carlos Torres; [Privacy]; Mike Castillo; [Privacy]  
[Privacy] James Roberts; James Setzer; Javier Ramirez; Kristan Delatori  
**Subject:** Re: Harding Ave./Lincoln Blvd. Beautification Project

We did not apply for a permit. I would ask that you ask the LAPD to assist the residents in asking the campers to move their stuff so the installation can proceed. My guess is that all be well. If there is any resistance the residents can wait for a formal cleanup.

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

**From:** Taylor Bazley <[taylor.bazley@lacity.org](mailto:taylor.bazley@lacity.org)>  
**Date:** 10/23/18 6:32 PM (GMT-08:00)  
**To:** Venice Stakeholders <[VeniceStakeholders@ca.rr.com](mailto:VeniceStakeholders@ca.rr.com)>  
**Cc:** [samantha\\_mehra@yahoo.com](mailto:samantha_mehra@yahoo.com), Carlos Torres <[veniceneighborsunited@yahoo.com](mailto:veniceneighborsunited@yahoo.com)>, [andyk@andyk.net](mailto:andyk@andyk.net), Mike Castillo <[mikecastillonre@gmail.com](mailto:mikecastillonre@gmail.com)>, [camey@cameyart.com](mailto:camey@cameyart.com), [thanhtran08141920@gmail.com](mailto:thanhtran08141920@gmail.com), James Roberts <[31381@lapd.online](mailto:31381@lapd.online)>, James Setzer <[31260@lapd.online](mailto:31260@lapd.online)>, Javier Ramirez <[39174@lapd.online](mailto:39174@lapd.online)>, Kristan Delatori <[32914@lapd.online](mailto:32914@lapd.online)>  
**Subject:** Re: Harding Ave./Lincoln Blvd. Beautification Project

Mark -

If this is permitted then LAPD would be able to support enforcement of your permit - my assumption is that this isn't permitted. If LAPD feels comfortable with their officers politely asking but not forcibly removing people (again assuming there is no permit) then they could do that but otherwise the way we would force people to leave an area is to fulfill a permit.

-Taylor

On Tue, Oct 23, 2018 at 6:26 PM Mark Ryavec <[VeniceStakeholders@ca.rr.com](mailto:VeniceStakeholders@ca.rr.com)> wrote:

Taylor,

Might it be possible for you to lend support in another manner?

The handful of campers have just landed there in the last couple days and a cleaning by Sanitation is not really necessary.

All it appears Captain Roberts is asking for is the council office's support for the installation of a few planter boxes on the parkway, as we previously have installed, with your support, around the Post Office and along Staples.

With your approval, the LAPD can certainly support the residents in asking the campers to move their belongings by 8 am Saturday morning so the installation can go forward.

The city can save the Sanitation clean up for more deserving locations.

Thank you for your consideration of this suggestion.

Mark

On 10/23/2018 5:24 PM, Taylor Bazley wrote:

Hi Samantha -

I'm sorry but the authorization process alone takes at absolute minimum two weeks, usually the fastest I can make it happen is 3 weeks, and 4/5 weeks is more standard.

The process for a posted clean up is the request goes in, LASAN responds to do a site evaluation and pings LAHSA, LAHSA needs to attempt to demonstrate rendering of services by visiting the site 3 documented times, they convey back authorization, the interdepartmental team needs to schedule this into their operations (usually the team is only in our council district two or three days a month), and then there needs to be a posting around the area 3 days in advance.

I know some neighbors might post that work will be done in an area at a given time and that has been useful at encouraging people to move at that time but a posted sanitation clean up is sort of a heavy lift that requires weeks notice and is according to the interdepartmental clean up crew's schedule (which doesn't usually include weekends).

-Taylor

On Mon, Oct 22, 2018 at 5:43 PM samantha mehra <[REDACTED]> wrote:

Hi Taylor,

Hope

--

**Taylor Bazley**

*Field Deputy - Venice, OFW, Silver Strand, Marina Peninsula*

Councilmember Mike Bonin

City of Los Angeles

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--

**Taylor Bazley**

*Field Deputy - Venice, OFW, Silver Strand, Marina Peninsula*

Councilmember Mike Bonin

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